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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 15-284 WHA
Plaintiff,) STIPULATION TO CONTINUE
v.) STATUS HEARING AND
ABEL ANTONIO ALARCON,) TO EXCLUDE TIME UNDER
Defendant.) SPEEDY TRIAL ACT;
) [PROPOSED] ORDER

STIPULATION

The United States of America, by and through Special Assistant United States Attorney Philip Kopczynski, and Defendant Abel Antonio Alarcon, by and through Assistant Federal Public Defender Candis Mitchell, hereby stipulate that, with the Court's approval, the status hearing currently scheduled for June 16, 2015 at 2:00 p.m. should be continued to June 30, 2015 at 2:00 p.m., and the time between June 16, 2015 and June 30, 2015 is excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for continuity of counsel. The reason for this requested continuance is that government

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**STIP. AND PROPOSED ORDER
NO. CR 15-284 WHA**

1 counsel will be in Washington, D.C. on June 16, 2015, and in San Jose appearing before the Honorable
2 Nathanael M. Cousins on the following Tuesday, June 23, 2015.

3 IT IS SO STIPULATED.

4 Dated: June 10, 2015

_____/s/_____
5 PHILIP KOPCZYNSKI
Special Assistant United States Attorney

7 Dated: June 10, 2015

_____/s/_____
8 CANDIS MITCHELL
9 Assistant Federal Public Defender

STIP. AND PROPOSED ORDER

NO. CR 15-284 WHA

1 **[PROPOSED] ORDER**

2 GOOD CAUSE APPEARING, upon stipulation of the parties,

3 THE COURT FINDS that government counsel is unavailable to appear at the status hearing set
4 for June 16, 2015 at 2:00 p.m.

5 THE COURT FURTHER FINDS that failing to exclude the time between June 16, 2015 and
6 June 30, 2015 would unreasonably deny the government continuity of counsel. *See* 18 U.S.C.
7 § 3161(h)(7)(B)(iv).

8 THE COURT FURTHER FINDS that the ends of justice served by excluding the time between
9 June 16, 2015 and June 30, 2015 from computation under the Speedy Trial Act outweigh the interests of
10 the public and the defendant in a speedy trial.

11 THEREFORE, IT IS HEREBY ORDERED that the status hearing set for June 16, 2015 at 2:00
12 p.m. shall be continued to June 30, 2015 at 2:00 p.m.

13 IT IS FURTHER ORDERED that the time between June 16, 2015 and June 30, 2015 shall be
14 excluded from computation under the Speedy Trial Act.

15 IT IS SO ORDERED.

16 Dated: June 10, 2015

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18 _____
19 THE HONORABLE WILLIAM ALSUP
20 United States District Judge

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